

PETER C. WOLFF, JR. #2332  
Federal Public Defender  
District of Hawaii

ALEXANDER SILVERT  
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Attorney for Defendant  
ABRAHAM NGUYEN MARTIN

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	Cr. No. 04-00322 DAE
	)	
Plaintiff,	)	
	)	MOTION TO STAY MITTIMUS
vs.	)	UNTIL JULY 10, 2006;
	)	MEMORANDUM OF LAW;
ABRAHAM NGUYEN MARTIN,	)	DECLARATION OF COUNSEL;
	)	EXHIBIT "A"; CERTIFICATE OF
Defendant.	)	SERVICE
_____	)	

**MOTION TO STAY MITTIMUS UNTIL JULY 10, 2006**

COMES NOW the defendant, ABRAHAM NGUYEN MARTIN,  
through counsel, Alexander Silvert, First Assistant Federal Defender, and moves  
this Honorable Court to stay mittimus in the above-captioned matters until July 10,

2006. Mr. Martin is presently scheduled to begin serving his 70 month sentence on March 6, 2006.

This motion is based upon the attached memorandum of law and Exhibit "A." An evidentiary hearing on this motion is not requested. The defendant acknowledges and agrees that this Court may rule upon this motion without holding an in-court hearing if that is the Court's inclination.

DATED: Honolulu, Hawaii, February 3, 2006.

/s/ Alexander Silvert

ALEXANDER SILVERT

Attorney for Defendant

ABRAHAM NGUYEN MARTIN

**CERTIFICATE OF SERVICE**

CHRISTINA FULLER, hereby certifies that on the date and by the method of service noted below, a true and correct copy of the foregoing was served on the following at the last known address on February 3, 2006:

Served Electronically through CM/ECF:

WILLIAM SHIPLEY  
Assistant United States Attorney  
Attorney for Plaintiff  
UNITED STATES OF AMERICA

/s/ Christina Fuller  
CHRISTINA FULLER  
Legal Secretary to  
ALEXANDER SILVERT  
Attorney for Defendant  
ABRAHAM NGUYEN MARTIN